

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES

v.

DANIQUE SIMPSON

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MAG NO. 24-16111

**CERTIFICATION OF COUNSEL
IN SUPPORT OF DEFENDANT'S
MOTION FOR RELEASE**


I, John J. McMahon, Esq., being of full age, hereby certify to the truth of the following:

1. I am an attorney in the State of New Jersey and in that capacity, I have been retained to represent Danique Simpson in the above matter.
2. I was initially retained to represent Mr. Simpson on July 11, 2024.
3. Mr. Simpson is presently detained in the Hudson County Correctional Facility pending the resolution of Mag. 24-16111 charging him with one count of Conspiracy to Commit Bank Fraud.
4. The defense consented to an Order of Detention signed by the Honorable James B. Clark, U.S.M.J. on May 30, 2024, with the understanding that once a bail package was approved, defense could move to file a motion of release.
5. The defense is now moving to allow for Mr. Simpson's release on the following conditions:
 - a. Defendant is to be released into the custody of third-party custodian Jinez Figueroa.

- b. Defendant is to be released on a \$100,000 unsecured appearance bond co-signed by Oshanea Barnes.
- c. Defendant is to be subject to Pretrial supervision.
- d. Defendant is to be subject to location monitoring.
- e. Defendant is to maintain at the residence approved by Pretrial Services at 72 Wolcott Terrace in Newark, New Jersey.
- f. Defendant is to be subject to Home Incarceration with electronic monitoring.

I certify that the above information is true. I am aware that if the above information is willfully false, I am subject to punishment.

Respectfully submitted,



John J. McMahon, Esq.
Attorney for Danique Simpson